

**UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF VIRGINIA
Charlottesville Division**

ELIZABETH SINES, SETH WISPELWEY,
MARISSA BLAIR, TYLER MAGILL, APRIL
MUNIZ, HANNAH PEARCE, MARCUS
MARTIN, NATALIE ROMERO, CHELSEA
ALVARADO, and JOHN DOE,

Plaintiffs,

v.

JASON KESSLER, RICHARD SPENCER,
CHRISTOPHER CANTWELL, JAMES
ALEX FIELDS, JR., VANGUARD
AMERICA, ANDREW ANGLIN,
MOONBASE HOLDINGS, LLC, ROBERT
“AZZMADOR” RAY, NATHAN DAMIGO,
ELLIOT KLINE a/k/a/ ELI MOSLEY,
IDENTITY EVROPA, MATTHEW
HEIMBACH, MATTHEW PARROTT a/k/a
DAVID MATTHEW PARROTT,
TRADITIONALIST WORKER PARTY,
MICHAEL HILL, MICHAEL TUBBS,
LEAGUE OF THE SOUTH, JEFF SCHOEP,
NATIONAL SOCIALIST MOVEMENT,
NATIONALIST FRONT, AUGUSTUS SOL
INVICTUS, FRATERNAL ORDER OF THE
ALT-KNIGHTS, MICHAEL “ENOC”
PEINOVICH, LOYAL WHITE KNIGHTS OF
THE KU KLUX KLAN, and EAST COAST
KNIGHTS OF THE KU KLUX KLAN a/k/a
EAST COAST KNIGHTS OF THE TRUE
INVISIBLE EMPIRE,

Defendants.

Civil Action No. 3:17-cv-00072-NKM

**[PROPOSED] ORDER TO SHOW CAUSE WHY DEFENDANTS MATTHEW
PARROTT AND TRADITIONALIST WORKER PARTY SHOULD NOT BE
SANCTIONED FOR SPOILIATION AND ORDERED TO PERMIT PLAINTIFFS TO
CONDUCT A FORENSIC EXAMINATION OF INFORMATION SYSTEMS**

WHEREAS, on March 14, 2018, Plaintiffs filed a Motion for an Order to Show Cause Why Defendants Matthew Parrott and Traditionalist Worker Party Should Not Be Sanctioned for Spoliation and Ordered to Permit Plaintiffs to Conduct a Forensic Examination of Information Systems (the “Motion”);

WHEREAS, the Court has considered Plaintiffs’ Motion and the papers filed in support thereof; and it appears that Plaintiffs have shown good cause for the entry of this Order. It is by this Court hereby:

ORDERED that Defendants Matthew Parrott and Traditionalist Worker Party appear at ____ a.m./p.m. on the ____ day of _____, 2018, Courtroom No. ____ of the United States Courthouse in Charlottesville, VA, and show cause, if any there be, why this Court should not grant said Motion and enter an Order: (1) prohibiting Matthew Parrott and Traditionalist Worker Party from further destroying relevant evidence; (2) permitting Plaintiffs immediately to electronically preserve and conduct a forensic examination of Matthew Parrott and Traditionalist Worker Party’s information systems and electronically stored information, including all computers and electronic devices, to attempt to recover any deleted data, at Parrott’s and TWP’s expense; (3) providing for adverse inferences to be drawn to the extent that any evidence has been lost or destroyed; and (4) awarding Plaintiffs the costs and attorneys’ fees associated with the Motion.

Dated: March ____, 2018

SO ORDERED

Hon. Joel C. Hoppe, M.J.